

Exhibit A

Atkinson-Baker, Inc.
www.depo.com

<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE SOUTHERN DISTRICT OF NEW YORK 3 - - - 4 EASTERN PROFIT CORPORATION,) LIMITED,) 5) Plaintiff/Counterclaim Defendant,) 6) v.) Case No. 7) 18-cv-2185 STRATEGIC VISION US, LLC,) (JGK) 8) Defendant/Counterclaim Plaintiff.) 9 ----- 10 11 12 Video deposition of LIANCHAO HAN, taken on behalf 13 of Defendant/Counterclaim Plaintiff, at the law 14 offices of Foley & Lardner, LLP, 3000 K Street, N.W., 15 Suite 600, Washington, D.C., commencing at 9:18 a.m., 16 Wednesday, August 28, 2019, before Catherine B. 17 Crump, a Notary Public in and for the District of 18 Columbia. 19 20 21 22</p> <p style="text-align: right;">Page 2</p>	<p>1 I N D E X 2 WITNESS: Lianchao Han 3 EXAMINATION PAGE 4 By Mr. Greim: 7, 285 5 By Mr. Grendi: 261 6 EXHIBITS 7 NO. DESCRIPTION PAGE 8 1 - August 28, 2019 Letter from Jeffrey 9 14 10 2 - "Dissident Reveals Secret Chinese 11 Intelligence Plans Targeting U.S." 55 12 3 - You Tube Video Translation, April 29, 2017 74 13 4 - "China's Pursuit of Fugitive Businessman 14 Guo Wengui Kicks Off Manhattan Caper Worthy 15 of Spy Thriller" 88 16 5 - Certified Translation: "A Proposal for a 17 Thorough and Comprehensive Solution 18 Regarding the Matters Involving Pangu 19 Bldg Investment and Other Concerning 20 Guo Wengui" 99 21 6 - You Tube Video Translation, 22 January 18, 2018</p> <p style="text-align: right;">Page 4</p>
<p>1 A P P E A R A N C E S: 2 FOR DEFENDANT/COUNTERCLAIM PLAINTIFF: 3 GRAVES, GARRETT, LLC BY: EDWARD D. GREIM, ESQ. 4 1100 Main Street, Suite 2700 Kansas City, Missouri 64105 5 (816) 256-3181 edgreim@gravesgarrett.com 6 ALSO PRESENT: 7 FRENCH WALLOP 8 MICHAEL WALLER 9 FOR PLAINTIFF/COUNTERCLAIM DEFENDANT: 10 ZEICHNER, ELLMAN & KRAUSE, LLP BY: ZACHARY GRENDI, ESQ. 11 1 Landmark Square Fourth Floor 12 Stamford, Connecticut 06901 zgrendi@zeklaw.com 13 ALSO PRESENT: 14 DANIEL PODHASKIE 15 YVETTE WANG 16 FOR THE WITNESS: 17 SCHULMAN, BHATTACHARYA BY: JEFFREY S. GAVENMAN, ESQ. 18 The Clark Building 7500 Old Georgetown Road 19 Suite 901 Bethesda, Maryland 20814 20 (240) 356-8553 jgavenman@schulmanbh.com 21 22 VIDEOGRAPHER: Steven Jones</p> <p style="text-align: right;">Page 3</p>	<p>1 EXHIBIT NO. PAGE 2 7 - Thumb Drive 130 3 8 - Proposal: "Vision" 130 4 9 - "Three-Year Timeline" 134 5 10 - Text Messages 140 6 11 - Research Agreement 222 7 12 - "Chinese Tycoon Holed Up in Manhattan 8 Hotel Is Accused of Spying for Beijing" 257 9 10 [Han Exhibit Nos. 10 and 11 are designated 11 confidential.] 12 13 WANG EXHIBIT NO. PAGE 14 5 - Text Messages 196 15 12 - Financial Forensic Research and 16 Tracking Research 170 17 18 [Wang Exhibit No. 12 is designated confidential.] 19 20 21 22</p> <p style="text-align: right;">Page 5</p>

2 (Pages 2 to 5)

Lianchao Han - Confidential
August 28, 2019

Atkinson-Baker, Inc.
www.depo.com

1	information about the Clark Hill matter? What was	09:38	1	colleagues that agree with me, we try to persuade him	09:40
2	your involvement?	09:38	2	not to pursue it, and that was the earliest	09:40
3	A. I was helping Miles for his asylum case.	09:38	3	discussion. Of course, he won't listen to me and I	09:40
4	Q. So then you had interaction with the	09:38	4	tried a few more times this, and then I don't think	09:41
5	Clark Hill lawyers?	09:38	5	he was -- you know, there's no way he agreed with me.	09:41
6	A. Correct.	09:38	6	So that was that.	09:41
7	Q. How do you know that Chinese hackers did	09:38	7	Then, later, I think we discussed. He didn't	09:41
8	hack the Clark Hill law firm?	09:38	8	discuss specifically about the case at all. He kept	09:41
9	A. Clark Hill told me.	09:38	9	saying French and Mike are frauds, cheated him, which	09:41
10	Q. Do you believe them?	09:38	10	we always have a different view on that. I disagree	09:41
11	A. Of course.	09:38	11	with him on that. So we argued back and forth. So	09:41
12	Q. Okay. Let me ask about -- you mentioned	09:38	12	that pretty much was our main conversation about the	09:41
13	a couple of different conversations with Mr. Guo	09:39	13	case, whether they're cheating him or not.	09:41
14	about this case.	09:39	14	Q. Why do you disagree?	09:41
15	A. Yes.	09:39	15	A. Because I think everybody comes in with	09:41
16	Q. We talked about the longer conversation	09:39	16	a good intention at the beginning.	09:42
17	and then you said you met with him a few more times	09:39	17	Q. Who are the colleagues of Mr. Guo's that	09:42
18	in the office.	09:39	18	agreed with your position early on?	09:42
19	A. Yes.	09:39	19	MR. GAVENMAN: Objection to form.	09:42
20	Q. Now, whose office was that?	09:39	20	Go ahead.	09:42
21	A. Miles' office.	09:39	21	THE WITNESS: At the meeting was his --	09:42
22	Q. Where is that office?	09:39	22	Victor Cedar and William Yu. Williams, he's a	09:42
Page 22			Page 24		
1	A. I think at -- what is that? 62 -- 64	09:39	1	manager, I think.	09:42
2	Street of New York.	09:39	2	BY MR. GREIM:	09:42
3	Q. 64th Street on the upper east side?	09:39	3	Q. Is this William Je, J-E?	09:42
4	A. Yeah.	09:39	4	A. J-E? I think Yu. Right? No.	09:42
5	Q. Are those also the Golden Spring	09:39	5	I don't remember his last name, but he was --	09:42
6	offices?	09:39	6	he was -- I remember he was at the meeting. He also	09:43
7	A. That, I don't know.	09:39	7	agreed with me not to pursue this case, because we --	09:43
8	Q. When did those meetings occur, to the	09:39	8	yeah. I predict what's going to happen exactly like	09:43
9	best of your recollection?	09:39	9	what's happening right now.	09:43
10	A. That's hard to know. I think maybe two	09:39	10	MR. GRENDI: I'm sorry. What was the name of	09:43
11	months ago, there was one, or three months ago and	09:39	11	the first individual?	09:43
12	then early -- I have been there maybe three, four	09:40	12	THE WITNESS: Victor.	09:43
13	times.	09:40	13	MR. GRENDI: Sorry. I was asking the court	09:43
14	Q. Does Mr. Guo ask for your advice about	09:40	14	reporter. I apologize.	09:43
15	this case?	09:40	15	MR. GREIM: That's okay. I was going to ask	09:43
16	A. No.	09:40	16	anyway.	09:43
17	Q. What did you discuss with him about the	09:40	17	MR. GRENDI: Okay. Fair enough.	09:43
18	case? Let's start with the earliest meeting that you	09:40	18	BY MR. GREIM:	09:43
19	can remember.	09:40	19	Q. Victor, what was his last name?	09:43
20	A. I think at the beginning, I strongly	09:40	20	A. Cedar. Cedar. Correct?	09:43
21	advised when he mentioned he's going to sue French	09:40	21	Q. Was he at Foley, Hogue?	09:43
22	and Mike, I opposed the idea. I also got his	09:40	22	A. No. He is a solo practitioner.	09:43
Page 23			Page 25		

7 (Pages 22 to 25)

Atkinson-Baker, Inc.
www.depo.com

1	Q. Could you spell his last name?	09:43	1	Vision would likely counterclaim against him?	09:46
2	A. C-E-D-A-R. I could be wrong. I always	09:43	2	A. Yes. Not specifically counterclaim. I	09:46
3	just call his first name.	09:43	3	have to take that back. I think they will create	09:46
4	Q. What did you understand that William's	09:43	4	difficult situation that will jeopardize your	09:46
5	position was with Mr. Guo?	09:44	5	political asylum. It's not worth it.	09:47
6	A. I think he manages his financial assets.	09:44	6	Q. Did you ever speak with Yvette Wang, who	09:47
7	Q. Do you know if he is the director of a	09:44	7	is sitting here at the table, about the lawsuit?	09:47
8	company called ACA?	09:44	8	A. No.	09:47
9	A. That, I didn't know.	09:44	9	Q. Do you know what role she plays for Mr.	09:47
10	Q. Have you heard of that company, ACA or	09:44	10	Guo?	09:47
11	ACA Capital Group Limited?	09:44	11	MR. GRENDI: Object to the form.	09:47
12	A. I'm not sure, but one time, I think -- I	09:44	12	THE WITNESS: Roughly.	09:47
13	don't know which one. There's a trust fund or	09:44	13	BY MR. GREIM:	09:47
14	something that French tried to buy real estate for	09:44	14	Q. What is that?	09:47
15	Miles that needed a letter of credit. I think that	09:44	15	A. She's been his longtime assistant. He	09:47
16	company provided it. I don't know which company	09:44	16	managed -- she managed the office and she was	09:47
17	provided it.	09:44	17	originally excluded from this discussion, this	09:47
18	I don't remember that, but I think -- yeah.	09:44	18	project with Mike and French, and later, she was the	09:47
19	Maybe that.	09:45	19	one who signed the contract, finished the	09:48
20	Q. This William Yu --	09:45	20	negotiation, signed the contract with them, managed	09:48
21	A. Yeah.	09:45	21	the project until, in the end, Miles asked -- took	09:48
22	Q. -- where does he live?	09:45	22	her out, put me back in.	09:48
Page 26			Page 28		
1	A. I don't know. He seems to travel back	09:45	1	That's all I know. I don't know specifically	09:48
2	and forth, Hong Kong, London, and New York.	09:45	2	what she does, but that's just based on my	09:48
3	Q. Does he have a role with McQuary Capital	09:45	3	observation.	09:48
4	Group? Does that sound familiar?	09:45	4	Q. Well, have you heard of an entity called	09:48
5	A. I don't remember. Is that Australian?	09:45	5	Golden Spring New York or Golden Spring Hong Kong?	09:48
6	Q. It is.	09:45	6	A. I heard about it, yeah.	09:48
7	A. Then he used to be involved before Miles	09:45	7	MR. GRENDI: Object to the form.	09:48
8	hired him.	09:45	8	BY MR. GREIM:	09:48
9	Q. When the last time you saw William?	09:45	9	Q. Do you know whether Ms. Wang has a role	09:48
10	A. Well, that may be a year ago or -- I	09:45	10	with either of the Golden Spring entities?	09:48
11	don't remember. Maybe eight months ago.	09:46	11	MR. GRENDI: Objection to the form.	09:48
12	Q. I want to go back now. I just want to	09:46	12	THE WITNESS: I didn't.	09:48
13	make sure we cover this. Is there anything else that	09:46	13	BY MR. GREIM:	09:48
14	you discussed with Mr. Guo in these meetings in his	09:46	14	Q. Why was it that Ms. Wang -- well, let me	09:48
15	office --	09:46	15	back up.	09:48
16	A. Yeah.	09:46	16	Why do you say Ms. Wang was originally	09:48
17	Q. -- about the case that we haven't	09:46	17	excluded from the discussion?	09:49
18	covered yet?	09:46	18	A. I didn't know. I think, later -- I	09:49
19	A. There may be something, but I don't	09:46	19	forgot if he said in the meeting or he said to French	09:49
20	remember, but mainly, I remember the major picture,	09:46	20	and Mike later, but the reason was Miles didn't trust	09:49
21	big picture, thing is just this.	09:46	21	her and she has many relatives that is within the	09:49
22	Q. Did you tell Mr. Guo that Strategic	09:46	22	system.	09:49
Page 27			Page 29		

8 (Pages 26 to 29)